

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

MASSACHUSETTS MUTUAL LIFE
INSURANCE COMPANY,

Plaintiff,

v.

MERRILL LYNCH, PIERCE, FENNER &
SMITH, INC.; DEUTSCHE BANK
SECURITIES INC.; GOLDMAN, SACHS &
CO., INC.; J.P. MORGAN SECURITIES LLC;
AND RBS SECURITIES, INC.,

Defendants.

No. 11-cv-30285-MAP

**JOINT SUBMISSION OF THE STIPULATION AND [PROPOSED] ORDER FOR THE
PRODUCTION AND EXCHANGE OF CONFIDENTIAL INFORMATION**

Pursuant to the Court's June 27, 2012 Scheduling Order, the parties have negotiated a joint proposed protective order for the production and exchange of confidential information in this action. They have reached agreement on all but one provision, and they hereby submit their joint proposed protective order without the disputed provision as Exhibit A. The text of the disputed provision proposed by Defendants is set forth in Exhibit B. On July 16, 2012, by 6:00 p.m. Eastern, MassMutual, which opposes inclusion of the disputed provision in the protective order, and Defendants, which favor the inclusion of the disputed provision, will file separate submissions with the Court setting forth their respective positions.

DATED: July 13, 2012

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CERTIFICATE OF SERVICE

I hereby certify that this document, filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on this 13th day of July, 2012.

/s/ Edward J. McDonough Jr.

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